

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**OFFICE OF COMPLIANCE & INSPECTION**

**IN RE: RHODE ISLAND RESOURCE RECOVERY  
CORPORATION**

**FILE NO.: OCI-WP-19-67  
X-Ref RIPDES RI0023442  
Referral No.: 18-05**

NOTICE OF VIOLATION

A. Introduction

Pursuant to Sections 42-17.1-2(21) and 42-17.6-3 of the Rhode Island General Laws, as amended, (“R.I. Gen. Laws”) you are hereby notified that the Director of the Department of Environmental Management (the “Director” of “DEM”) has reasonable grounds to believe that the above-named party (“Respondent”) has violated certain statutes and/or administrative regulations under DEM's jurisdiction.

B. Administrative History

On 14 March 2016, DEM issued a Significant Noncompliance (“SNC”) letter to Respondent for the violations that are the subject of this Notice of Violation (“NOV”). On 25 March 2016, Respondent submitted a letter to DEM in response to the SNC letter. Respondent attributed the violations to active portions of the Phase V landfill that would be addressed as part of final cover of the landfill that was scheduled to commence in May 2016. On or about December 2016, Respondent completed the final cover of the landfill. On 12 September 2018, DEM issued an SNC letter to Respondent for continuing violations. On 27 September 2018, Respondent submitted a letter to DEM in response to the SNC letter. Respondent attributed the violations to construction of the Phase VI-Area 3 portion of the landfill and leachate from a portion of the Phase V landfill and that repairs were underway. On or about 15 January 2019, 15 April 2019, 15 May 2019, and 14 June 2019 Respondent submitted letters to DEM noting continuing violations. The 15 January 2019, 15 April 2019 and 15 May 2019 letters attributed the violations to large rain events and/or active construction at the landfill. The 14 June 2019 letter to DEM provided no explanation regarding the cause of the violations. On or about 15 January 2020, Respondent submitted a letter to DEM noting continuing violations. The letter attributed some of the violations to a rain event that washed out a portion of the landfill slope.

C. Facts

- (1) The property is located at 65 Shun Pike in the Town of Johnston, Rhode Island (the “Property”). The Property includes a facility that is engaged in the recycling and disposal of solid waste (the “Facility”).

- (2) Respondent was issued Rhode Island Pollutant Discharge Elimination System (“RIPDES”) Permit No. RI0023442 (the “Permit”) on 24 April 2015 that became effective on 1 July 2015. The Permit authorizes Respondent to discharge stormwater from treatment pond 2 (“Pond 2”) at the Facility to Upper Simmons Reservoir.
- (3) The Permit requires Respondent to:
- (a) Meet a monthly average and daily maximum limit for Total Ammonia (“Ammonia) of 4.9 milligrams per liter (“ppm”) and 10.0 ppm, respectively;
  - (b) Meet a monthly average and daily maximum limit for Total Suspended Solids (“TSS”) of 27 ppm and 88 ppm, respectively;
  - (c) Collect samples of the water discharging from Pond 2 at a minimum frequency of once per month from April through June and once per quarter from July through March and analyze the samples for, among other pollutants, Ammonia and TSS (the “Analyses”); and
  - (d) Report the results of the Analyses to DEM on Discharge Monitoring Reports (“DMRs”).
- (4) The Respondent submitted DMRs for July 2015 through May 2019 to DEM.
- (5) DEM’s review of the DMRs revealed the following noncompliance with the Permit limits for Ammonia:

<b>Monitoring Period</b>	<b>Reported Monthly Average (ppm)</b>	<b>Reported Daily Maximum (ppm)</b>
7/1/15-9/30/15	21.6	21.6
10/1/15-12/31/15	17.2	17.2
1/1/16-3/31/16	8.26	
4/1/16-4/30/16	5.46	
5/1/16-5/31/16	19	19
6/1/16-6/30/16	20.3	20.3
7/1/16-9/30/16	6.86	
10/1/16-12/31/16	7.91	
1/1/17-3/31/17	5.46	
6/1/17-6/30/17	5.9	
10/1/17-12/31/17	5.45	
1/1/18-3/31/18	7.43	12
4/1/18-4/30/18	13	13
5/1/18-5/31/18	22	22

6/1/18-6/30/18	12.6	19
10/1/18-12/31/18	6.84	11
1/1/19-3/31/19	11.13	15
4/1/19-4/30/19	5.2	
5/1/19-5/30/19	15	15
6/1/19-6/30/19	7.6	
7/1/19-9/30/19	6.5	
10/1/19-12/31/19	5.2	

- (6) DEM's review of the DMRs revealed the following noncompliance with the Permit limits for TSS:

<b>Monitoring Period</b>	<b>Reported Monthly Average (ppm)</b>	<b>Reported Daily Maximum (ppm)</b>
7/1/15-9/30/15	36	
10/1/15-12/31/15	88	
1/1/16-3/31/16	80	
4/1/16-4/30/16	77	
1/1/17-3/31/17	146	146
4/1/17-4/30/17	39	
10/1/17-12/31/17	42.5	105
1/1/18-3/31/18	267.5	730
4/1/18-4/30/18	190	190
6/1/18-6/30/18	160	290
7/1/18-9/30/18	55.2	120
10/1/18-12/31/18	79.1	200
1/1/19-3/31/19	90.25	150
4/1/19-4/30/19	61	
10/1/19-12/31/19	35	

D. Violation

Based on the foregoing facts, the Director has reasonable grounds to believe that you have violated the following statutes and/or regulations:

- (1) **Rhode Island's *Water Pollution Act*, Section 46-12-5(b)** – requiring the discharge of any pollutant into waters of the State comply with the terms and conditions of a permit and applicable regulations.
- (2) **Rhode Island Code of Regulations titled *Water Quality Regulations (250-RICR-150-05-1)* (the “Water Quality Regulations”)**
  - (a) **Rule 11(B) [recently amended to Part 1.13(B)]** – requiring the discharge of pollutants into the waters of the State comply with the terms and conditions of a permit issued by DEM.
  - (b) **Rule 16(A) [recently amended to Part 1.18(A)]** – mandating compliance with all terms, conditions, management practices and operation and maintenance requirements set forth in a permit.
- (3) **Rhode Island Code of Regulations titled *Regulations for the Rhode Island Pollutant Discharge Elimination System (250-RICR-150-10-1)* (the “RIPDES Regulations”) Rule 14.02(a) [recently amended to Part 1.14(B)(1)]** – requiring the permittee to comply with all conditions of the permit.

E. Order

Based upon the violations alleged above and pursuant to R.I. Gen. Laws Section 42-17.1-2(21), you are hereby ORDERED to:

- (1) **Within 90 days of receipt of the NOV**, submit a report to DEM that summarizes the findings of an investigation into the cause of the Ammonia and TSS violations, evaluates the need for any additional treatment (including the use of aerators) to eliminate the violations, and includes a proposed schedule to install any necessary additional treatment (the “Report”). The Report must also evaluate whether leachate from the landfill is entering Pond 2, the actions that can be taken to prevent the leachate from entering Pond 2 (if the evaluation concludes that leachate from the landfill is entering Pond 2), and a schedule to complete the work.
- (2) The Report shall be subject to DEM's review and approval. Upon review, DEM shall provide written notification to Respondent either granting formal approval or stating the deficiencies therein. Within 14 days (unless a longer time is specified) of receiving a notification of deficiencies, Respondent shall submit to DEM information necessary to correct the deficiencies.
- (3) Upon approval of the Report by DEM, Respondent shall complete all work in accordance with the approved schedule.

F. Penalty

- (1) Pursuant to R.I. Gen. Laws Section 42-17.6-2, the following administrative penalty, as more specifically described in the attached penalty summary and worksheets, is hereby ASSESSED, against each named Respondent:

**\$100,000**

- (2) The proposed administrative penalty is calculated pursuant to the Rhode Island Code of Regulations titled *Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)* and must be paid to DEM within 30 days of your receipt of the NOV. Payment shall be in the form of a check made payable to the “General Treasury - Water & Air Protection Program” and shall be forwarded to DEM’s Office of Compliance and Inspection, 235 Promenade Street, Suite 220, Providence, Rhode Island 02908-5767.
- (3) Penalties assessed against Respondent in the NOV are penalties payable to and for the benefit of the State of Rhode Island and are not compensation for actual pecuniary loss.

G. Right to Administrative Hearing

- (1) Pursuant to R.I. Gen. Laws Chapters 42-17.1, 42-17.6, 42-17.7 and 42-35, each named respondent is entitled to request a hearing before DEM’s Administrative Adjudication Division regarding the allegations, orders and/or penalties set forth in Sections B through F above. All requests for hearing MUST:
- (a) Be in writing. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.6-4(b);
- (b) Be **RECEIVED** by DEM's Administrative Adjudication Division, at the following address, within 20 days of your receipt of the NOV. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.7-9:

Administrative Clerk  
Administrative Adjudication Division  
235 Promenade Street, Room 350  
Providence, RI 02908-5767

- (c) Indicate whether you deny the alleged violations and/or whether you believe that the administrative penalty is excessive. See R.I. Gen. Laws Section 42-17.6-4(b); **AND**

- (d) State clearly and concisely the specific issues which are in dispute, the facts in support thereof and the relief sought or involved, if any. See Part 1.7(B) of the Rhode Island Code of Regulations titled *Rules and Regulations for the Administrative Adjudication Division (250-RICR-10-00-1*.
- (2) A copy of each request for hearing must also be forwarded to:
- Susan B. Forcier, Esquire  
DEM - Office of Legal Services  
235 Promenade Street, 4<sup>TH</sup> Floor  
Providence, RI 02908-5767
- (3) Each named respondent has the right to be represented by legal counsel at all administrative proceedings relating to this matter.
- (4) Each respondent must file a separate and timely request for an administrative hearing before DEM's Administrative Adjudication Division as to each violation alleged in the written NOV. If any respondent fails to request a hearing in the above-described time or manner with regard to any violation set forth herein, then the NOV shall automatically become a Final Compliance Order enforceable in Superior Court as to that respondent and/or violation and any associated administrative penalty proposed in the NOV shall be final as to that respondent. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and (vi) and 42-17.6-4(b) and (c).
- (5) Failure to comply with the NOV may subject each respondent to additional civil and/or criminal penalties.
- (6) The NOV does not preclude the Director from taking any additional enforcement action nor does it preclude any other local, state, or federal governmental entities from initiating enforcement actions based on the acts or omissions described herein.

If you have any legal questions, you may contact (or if you are represented by an attorney, please have your attorney contact) Susan Forcier of DEM's Office of Legal Services at (401) 222-6607. All other inquiries should be directed to David E. Chopy of DEM's Office of Compliance and Inspection at (401) 222-1360 extension 7119.

Please be advised that any such inquiries do not postpone, eliminate, or otherwise extend the need for a timely submittal of a written request for a hearing, as described in Section G above.

FOR THE DIRECTOR

\_\_\_\_\_  
David E. Chopy, Administrator  
Office of Compliance and Inspection

Dated: \_\_\_\_\_

CERTIFICATION

I hereby certify that on the \_\_\_\_\_ day of \_\_\_\_\_  
the within Notice of Violation was forwarded to:

RHODE ISLAND RESOURCE RECOVERY CORPORATION  
c/o RODIO & URSILLO, LTD., Registered Agent  
86 Weybosset Street, Suite 400  
Providence, RI 02903

by Certified Mail.

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# ADMINISTRATIVE PENALTY SUMMARY

Program: OFFICE OF COMPLIANCE AND INSPECTION, Water Pollution  
 File Nos.: OCI-WP-19-67 x-ref RIPDES RI0023442  
 Respondent: RHODE ISLAND RESOURCE RECOVERY CORPORATION

<b>GRAVITY OF VIOLATION</b>					
SEE ATTACHED "PENALTY MATRIX WORKSHEETS."					
VIOLATION No. & CITATION	APPLICATION OF MATRIX		PENALTY CALCULATION		AMOUNT
	Type	Deviation	Penalty from Matrix	Number or Duration of Violations	
D (1), D (2) and D (3) – Failure to comply with permit for Ammonia	Type I (\$25,000 Max. Penalty) *	Major	\$25,000	2 years	\$50,000
D (1), D (2) and D (3) – Failure to comply with permit for TSS	Type I (\$25,000 Max. Penalty) *	Major	\$25,000	2 years	\$50,000
<b>SUB-TOTAL</b>					<b>\$100,000</b>

\*Maximum Penalties represent the maximum penalty amounts per day, per violation.

## ECONOMIC BENEFIT FROM NONCOMPLIANCE

COSTS OF COMPLIANCE, EQUIPMENT, O&M, STUDIES OR OTHER DELAYED OR AVOIDED COSTS, INCLUDING INTEREST AND/OR ANY COMPETITIVE ADVANTAGE DERIVED OVER ENTITIES THAT COMPLY. NOTE: ECONOMIC BENEFIT MUST BE INCLUDED IN THE PENALTY UNLESS:

- THERE IS NO IDENTIFIABLE BENEFIT FROM NONCOMPLIANCE; OR
- THE AMOUNT OF ECONOMIC BENEFIT CAN NOT BE QUANTIFIED.

A review of the record in this matter has revealed that Respondent has either enjoyed no identifiable benefit from the noncompliance alleged in this enforcement action or that the amount of economic benefit that may have resulted cannot be quantified.

## COST RECOVERY

ADDITIONAL OR EXTRAORDINARY COSTS INCURRED BY THE DIRECTOR DURING THE INVESTIGATION, ENFORCEMENT AND RESOLUTION OF AN ENFORCEMENT ACTION (EXCLUDING NON-OVERTIME PERSONNEL COSTS), FOR WHICH THE STATE IS NOT OTHERWISE REIMBURSED.

A review of the record in this matter has revealed that DEM has not incurred any additional or extraordinary costs during the investigation, enforcement and resolution of this enforcement action (excluding non-overtime personnel costs), for which the State is not otherwise reimbursed.

**TOTAL PENALTY PROPOSED UNDER PENALTY REGULATIONS = \$100,000**

**PENALTY MATRIX WORKSHEET**

CITATION: Failure to comply with permit for Ammonia

VIOLATION NOs.: D (1), D (2) and D (3)

<b>TYPE</b>		
<u>  </u> <b>TYPE I</b>	<u>  </u> <b>TYPE II</b>	<u>  </u> <b>TYPE III</b>
<u>DIRECTLY</u> related to protecting health, safety, welfare or environment.	<u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.	<u>INCIDENTAL</u> to protecting health, safety, welfare or environment.

**DEVIATION FROM THE STANDARD**  
THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

**FACTORS CONSIDERED:**

Taken from Part 1.10(A)(1)(b) of the Rhode Island Code of Regulations titled *Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)*.

- (1) **The extent to which the act or failure to act was out of compliance:** Respondent failed to comply with the Permit by discharging stormwater from the facility to Upper Simmons Reservoir in noncompliance with the Permit limits for Ammonia. Compliance with permit limits is a major objective of the RIPDES Regulations and Water Quality Regulations and is of major importance to the regulatory program.
- (2) **Environmental conditions:** Upper Simmons Reservoir is classified as Class B waters. These waters are designated for fish and wildlife habitat and primary and secondary contact recreational activities. The Ammonia levels in the discharge from Pond 2 ranged from 1.1 times to 2.3 times over the Permit limit from the 3<sup>RD</sup> quarter 2018 through the 4<sup>TH</sup> quarter 2019.
- (3) **Amount of the pollutant:** Considered, but not utilized for this calculation.
- (4) **Toxicity or nature of the pollutant:** The stormwater that is discharged to Pond 2 is considered landfill wastewater; as such, under Federal rules the stormwater is subject to technology-based limits for, among other things, Ammonia. DEM determined that water quality-based permit limits were not required for Ammonia.
- (5) **Duration of the violation:** Approximately 5 years – the violations were first reported to DEM in the DMR report for the 3<sup>RD</sup> quarter 2015. DEM only assessed a penalty for the violations that occurred in 2018 and 2019, as it was believed that closure of the Phase VI-Area 3 portion of the landfill (substantially completed in mid-2018) would resolve the noncompliance.
- (6) **Areal extent of the violation:** Considered, but not utilized for this calculation.

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent has not taken reasonable and appropriate steps to prevent and/or mitigate the noncompliance, despite receiving SNC letters from DEM on 14 March 2016 and 12 September 2018. In response to the 14 March 2016 SNC letter, Respondent stated that it believed the violations would be resolved upon completion of the final cover of landfill of the active portions of the Phase V landfill, which was scheduled to commence in May 2016. In the 12 September 2018 SNC letter, DEM required Respondent to submit a plan and schedule to correct the violations, including an evaluation of the use of aeration. In response to the 12 September 2018 SNC letter, Respondent stated that it believed the violations would be resolved once the work on the Phase VI-Area 3 portion of the landfill was complete and that it did not believe aeration was required. On or about 15 January 2019 and 15 April 2019, Respondent submitted its DMR reports to DEM. The reports stated that most of the work on the Phase VI-Area 3 portion of the landfill was complete. The reports provided no clear explanation as to the cause of the continued violations and did not identify any actions Respondent intended to take to address the violations. Subsequent reports also provided no clear explanation as to the cause of the continued violations and did not identify any action Respondent intended to take to address the violations.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** DEM issued a Notice of Violation to Respondent on 1 February 2005 for the discharge of stormwater from Pond 2. The violations in that NOV pertained to water quality impacts to Cedar Swamp Brook and Upper Simmons Reservoir from Pond 2. DEM issued a Notice of Violation to Respondent on 14 July 2014 for failing to comply with the previous permit issued to Respondent for the discharge of stormwater to Cedar Swamp Brook. The violations in that NOV pertained to a failure to comply with permit limits for Ammonia from treatment pond 11.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Negligence is attributable to Respondent for its failure to comply with the Permit. Respondent had control over the violations and had an obligation to ensure compliance with the Permit.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

<u>  X  </u> MAJOR	MODERATE	MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	<b>MAJOR</b>	\$12,500 to \$25,000 <b>\$25,000</b>	\$6,250 to \$12,500	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	MINOR	\$2,500 to \$6,250	\$1,250 to \$2,500	\$250 to \$1,250

**PENALTY MATRIX WORKSHEET**

CITATION: Failure to comply with permit for TSS

VIOLATION NOs.: D (1), D (2) and D (3)

<b>TYPE</b>		
<u><b>X</b></u> <b>TYPE I</b> <u>DIRECTLY</u> related to protecting health, safety, welfare or environment.	<u>      </u> <b>TYPE II</b> <u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.	<u>      </u> <b>TYPE III</b> <u>INCIDENTAL</u> to protecting health, safety, welfare or environment.

**DEVIATION FROM THE STANDARD**  
THE DEGREE TO WHICH A PARTICULAR VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.

**FACTORS CONSIDERED:**

Taken from Part 1.10(A)(1)(b) of the Rhode Island Code of Regulations titled *Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)*.

- (1) **The extent to which the act or failure to act was out of compliance:** Respondent failed to comply with the Permit by discharging stormwater from the facility to Upper Simmons Reservoir in noncompliance with the Permit limits for TSS. Compliance with permit limits is a major objective of the RIPDES Regulations and Water Quality Regulations and is of major importance to the regulatory program.
- (2) **Environmental conditions:** Upper Simmons Reservoir is classified as Class B waters. These waters are designated for fish and wildlife habitat and primary and secondary contact recreational activities. The TSS levels in the discharge from Pond 2 ranged from 1.3 times to 3.3 times over the Permit limit from the 3<sup>RD</sup> quarter 2018 through the 4<sup>TH</sup> quarter 2019.
- (3) **Amount of the pollutant:** Considered, but not utilized for this calculation.
- (4) **Toxicity or nature of the pollutant:** The stormwater that is discharged to Pond 2 is considered landfill wastewater; as such, under Federal rules the stormwater is subject to technology-based limits for, among other things, TSS. DEM determined that water quality-based permit limits were not required for TSS.
- (5) **Duration of the violation:** Approximately 5 years – the violations were first reported to DEM in the DMR report for the 3<sup>RD</sup> quarter 2015. DEM only assessed a penalty for the violations that occurred in 2018 and 2019, as it was believed that closure of the Phase VI-Area 3 portion of the landfill (substantially completed in mid-2018) would resolve the noncompliance.
- (6) **Areal extent of the violation:** Considered, but not utilized for this calculation.

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent has not taken reasonable and appropriate steps to prevent and/or mitigate the noncompliance, despite receiving SNC letters from DEM on 14 March 2016 and 12 September 2018. In response to the 14 March 2016 SNC letter, Respondent stated that it believed the violations would be resolved upon completion of the final cover of landfill of the active portions of the Phase V landfill, which was scheduled to commence in May 2016. In the 12 September 2018 SNC letter, DEM required Respondent to submit a plan and schedule to correct the violations, including an evaluation of the use of aeration. In response to the 12 September 2018 SNC letter, Respondent stated that it believed the violations would be resolved once the work on the Phase VI-Area 3 portion of the landfill was complete and that it did not believe aeration was required. On or about 15 January 2019 and 15 April 2019, Respondent submitted its DMR reports to DEM. The reports stated that most of the work on the Phase VI-Area 3 portion of the landfill was complete. The reports provided no clear explanation as to the cause of the continued violations and did not identify any actions Respondent intended to take to address the violations. Subsequent reports also provided no clear explanation as to the cause of the continued violations and did not identify any action Respondent intended to take to address the violations.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** DEM issued a Notice of Violation to Respondent on 1 February 2005 for the discharge of stormwater from Pond 2. The violations in that NOV pertained to water quality impacts to Cedar Swamp Brook and Upper Simmons Reservoir from Pond 2. DEM issued a Notice of Violation to Respondent on 14 July 2014 for failing to comply with the previous permit issued to Respondent for the discharge of stormwater to Cedar Swamp Brook. The violations in that NOV pertained to a failure to comply with permit limits for Ammonia from treatment pond 11.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Negligence is attributable to Respondent for its failure to comply with the Permit. Respondent had control over the violations and had an obligation to ensure compliance with the Permit.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

<u>  X  </u> MAJOR	MODERATE	MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$25,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	<b>MAJOR</b>	\$12,500 to \$25,000 <b>\$25,000</b>	\$6,250 to \$12,500	\$2,500 to \$6,250
	MODERATE	\$6,250 to \$12,500	\$2,500 to \$6,250	\$1,250 to \$2,500
	MINOR	\$2,500 to \$6,250	\$1,250 to \$2,500	\$250 to \$1,250

